



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

**July 25, 2003**

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

TO: Interested Parties / Applicant

RE: **STONE CONTAINER 007-15808-00010**

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## **Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
Administrator, Christine Todd Whitman  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



Governor

Lori F. Kaplan  
Commissioner

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*make Indiana a cleaner, healthier place to live.*

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-

6015

(317) 232-8603  
(800) 451-6027  
[www.state.in.us/idem](http://www.state.in.us/idem)

## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Stone Container Corporation  
dba Fowler Specialty Packaging  
407 South Adeway Road  
Fowler, Indiana 47944**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T007-15808-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: <b>July 25, 2003</b>  Expiration Date: <b>July 25, 2008</b>

## TABLE OF CONTENTS

### SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### SECTION B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3]
- B.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Re-issuance, or Termination [326 IAC 2-7-5 (6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
- B.17 Permit Renewal [326 IAC 2-7-4]
- B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]
- B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]
- B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]
- B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

### SECTION C SOURCE OPERATION CONDITIONS

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

#### Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

## **TABLE OF CONTENTS (Continued)**

### **Compliance Requirements [326 IAC 2-1.1-11]**

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]  
C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]  
C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]  
C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]  
[326 IAC 2-7-6(1)]

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]  
C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]  
C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC  
2-7-5] [326 IAC 2-7-6]  
C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326  
IAC 2-7-6]

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-7-6]  
C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]  
C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

### **Stratospheric Ozone Protection**

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

## **SECTION D.1 FACILITY OPERATION CONDITIONS**

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR 63, Subpart A]  
D.1.2 Printing and Publishing NESHAP [326 IAC 20] [40 CFR 63, Subpart KK]  
D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-5-5(e)]  
D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-5-5(c)(1)]  
D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

### **Compliance Determination Requirements**

- D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.7 Record Keeping Requirements  
D.1.8 Reporting Requirements

## **SECTION D.2 FACILITY OPERATION CONDITIONS**

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-3-2]  
D.2.2 Particulate Emission Limitations [326 IAC 6-2-4]

## Quarterly Deviation and Compliance Monitoring Report

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

---

The Permittee owns and operates a stationary coated paper bag manufacturing operation.

Responsible Official:	Plant Manager
Source Address:	407 South Adeway Road, Fowler, Indiana 47944
Mailing Address:	2127 South Adeway Road, Fowler, Indiana 47944
General Source Phone Number:	(765) 884-1040
SIC Code:	2673
County Location:	Benton County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD Rules
	Area Source, Section 112 of the Clean Air Act
	Not 1 of the 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) flexographic printing press, identified as press No. 4, utilizing water-based inks, with a maximum line speed of five hundred (500) feet per minute and a maximum web width of thirty-one (31) inches, constructed in 1988, and exhausting to two (2) stacks (stacks S<sub>2</sub> and S<sub>3</sub>).
- (b) One (1) flexographic printing press, identified as press No. 5, utilizing water-based inks, with a maximum line speed of five hundred (500) feet per minute and a maximum web width of forty-six (46) inches, constructed in 1991, and exhausting to one (1) stack (stacks S<sub>4</sub>).
- (c) One (1) flexographic printing press, identified as press No. 6, utilizing water-based inks, with a maximum line speed of one thousand (1000) feet per minute and a maximum web width of twenty (20) inches, constructed in 1999, and exhausting to one (1) stack (stacks S<sub>17</sub>).
- (d) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 48, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 2000, and exhausting into the plant atmosphere.
- (e) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 49, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 2001, and exhausting into the plant atmosphere.

- (f) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 50, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 1998, and exhausting into the plant atmosphere.
- (g) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 51, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 1997, and exhausting into the plant atmosphere.
- (h) Six (6) flexographic tail printers and associated tuber/bagger machine, identified as TP 52, 53, 55, 56, 57, and 58, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 1994, and exhausting into the plant atmosphere.
- (i) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 54, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-four (24) inches, constructed in 1994, and exhausting into the plant atmosphere.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-2-4]:
  - (1) One (1) natural gas and fuel oil No. 2 fired boiler, identified as B1, with a maximum heat input capacity of 5.23 MMBtu per hour;
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2]; and
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).



## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date, as determined of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) As provided in 326 IAC 2-7-5(6), the Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and re-issuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

---

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the

Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

---

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

---

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Re-issuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

---

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

---

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;



- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

---

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1]**

---

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]**

---

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

---

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

---

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

---

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

---

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

---

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (  $\pm 2\%$  ) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

---

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

---

If a regulated substance, as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

---

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan ; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.



- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances, in accordance with Section D, when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]**

- 
- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

---

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this Permit, shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

---

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management

Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Paper Bag Coating Operation

- (a) One (1) flexographic printing press, identified as press No. 4, utilizing water-based inks, with a maximum line speed of five hundred (500) feet per minute and a maximum web width of thirty-one (31) inches, constructed in 1988, and exhausting to two (2) stacks (stacks S<sub>2</sub> and S<sub>3</sub>).
- (b) One (1) flexographic printing press, identified as press No. 5, utilizing water-based inks, with a maximum line speed of five hundred (500) feet per minute and a maximum web width of forty-six (46) inches, constructed in 1991, and exhausting to one (1) stack (stacks S<sub>4</sub>).
- (c) One (1) flexographic printing press, identified as press No. 6, utilizing water-based inks, with a maximum line speed of one thousand (1000) feet per minute and a maximum web width of twenty (20) inches, constructed in 1999, and exhausting to one (1) stack (stacks S<sub>17</sub>).
- (d) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 48, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 2000, and exhausting into the plant atmosphere.
- (e) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 49, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 2001, and exhausting into the plant atmosphere.
- (f) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 50, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 1998, and exhausting into the plant atmosphere.
- (g) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 51, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 1997, and exhausting into the plant atmosphere.
- (h) Six (6) flexographic tail printers and associated tuber/bagger machine, identified as TP 52, 53, 55, 56, 57, and 58, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 1994, and exhausting into the plant atmosphere.
- (i) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 54, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-four (24) inches, constructed in 1994, and exhausting into the plant atmosphere.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR Part 63, Subpart KK.

**D.1.2 Printing and Publishing NESHAP [326 IAC 20] [40 CFR 63, Subpart KK]**

---

The potential to emit a single HAP from flexographic presses No. 4, No. 5, and No. 6 and flexographic tail printers TP 48 through TP 58, combined, is less than ten (10) tons per year. The potential to emit any combination of HAPs from flexographic presses No. 4, No. 5, and No. 6 and flexographic tail printers TP 48 through TP 58, combined, is less than twenty-five (25) tons per year. Therefore the emission limitation requirements of 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry) are not applicable. However, record keeping requirements do apply and these have been included in Condition D.1.7(a).

Any change or modification which increases the potential to emit of a single HAP to ten (10) tons per year or for any combination of HAPs to twenty-five (25) tons per year for flexographic presses No. 4, No. 5, and No. 6 and flexographic tail printers TP 48 through TP 58, combined, shall be approved by the Office of Air Quality before any such change may occur.

**D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-5-5(e)]**

---

The VOC input to flexographic printing press No.5 shall not exceed twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limitation is equivalent to VOC emissions from flexographic printing press No. 5 of less than twenty-five (25) tons per year. Compliance with this limit will render the requirements of 326 IAC 8-5-5(e) (Graphic Arts Operations) not applicable.

**D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-5-5(c)(1)]**

---

Pursuant to 326 IAC 8-5-5(c)(1) (Graphic Arts Operations), the volatile fraction of the ink, as it is applied to the substrate, of the flexographic printing presses No. 4, No. 5, and No. 6, and flexographic tail printers TP48 through TP58 shall contain twenty-five percent (25%) by volume or less of organic solvent and seventy-five percent (75%) by volume or more of water.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

---

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

**Compliance Determination Requirements**

**D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)**

---

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.7 Record Keeping Requirements**

---

- (a) Pursuant to 40 CFR 63.829(d), the owner or operator of each facility shall maintain records of all required measurements and calculations needed to demonstrate that the HAP usage is less than ten (10) tons per twelve consecutive month period with compliance determined at the end of each month for a single HAP and less than twenty-five (25) tons per twelve consecutive month period with compliance determined at the end of each month for any combination of HAPs. These records shall include the mass of all HAP containing

materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

- (b) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.2, D.1.3, and D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC and HAP content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The volume weighted VOC and HAP content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC and HAP usage for each month; and
  - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-2-4]:
  - (1) One (1) natural gas and fuel oil No. 2 fired boiler, identified as B1, with a maximum heat input capacity of 5.23 MMBtu per hour;
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5]; and
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4] [326 IAC 6-5].

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.2 Particulate Emission Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the 5.23 MMBtu per hour boiler constructed after September 1, 1983 shall be limited to 0.6 pounds per MMBtu heat input.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Stone Container Corporation dba Fowler Specialty Packaging  
Source Address: 407 South Adeway Road, Fowler, Indiana 47944  
Mailing Address: 2127 South Adeway Road, Fowler, Indiana 47944  
Part 70 Permit No.: T007-15808-00010

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Affidavit (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Stone Container Corporation dba Fowler Specialty Packaging  
Source Address: 407 South Adeway Road, Fowler, Indiana 47944  
Mailing Address: 2127 South Adeway Road, Fowler, Indiana 47944  
Part 70 Permit No.: T007-15808-00010

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:

Date/Time Emergency was corrected:

Was the facility being properly operated at the time of the emergency?    Y    N  
Describe:

Type of Pollutants Emitted: TSP, PM-10, SO<sub>2</sub>, VOC, NO<sub>x</sub>, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency:

Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Stone Container Corporation dba Fowler Specialty Packaging  
Source Address: 407 South Adeway Road, Fowler, Indiana 47944  
Mailing Address: 2127 South Adeway Road, Fowler, Indiana 47944  
Part 70 Permit No.: T007-15808-00010  
Facility: Flexographic Printing Press No. 5  
Parameter: VOC Input  
Limit: The VOC input to Flexographic Printing Press No. 5 shall be less than twenty-four and nine tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Stone Container Corporation dba Fowler Specialty Packaging  
Source Address: 407 South Adeway Road, Fowler, Indiana 47944  
Mailing Address: 2127 South Adeway Road, Fowler, Indiana 47944  
Part 70 Permit No.: T007-15808-00010

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**July 25, 2003**

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Operating Permit  
Renewal**

**Source Background and Description**

Source Name: Stone Container Corporation dba Fowler Specialty Packaging  
Source Location: 407 South Adeway Road, Fowler, IN 47944  
County: Benton County  
SIC Code: 2673  
Operation Permit No.: T007-15808-00010  
Permit Reviewer: ERG/AO

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Stone Container Corporation dba Fowler Specialty Packaging relating to the operation of a paper bag coating operation.

**Permitted Emission Units and Pollution Control Equipment**

This source consists of the following emission units and pollution control devices:

- (a) One (1) flexographic printing press, identified as press No. 4, utilizing water-based inks, with a maximum line speed of five hundred (500) feet per minute and a maximum web width of thirty-one (31) inches, constructed in 1988, and exhausting to two (2) stacks (stacks S<sub>2</sub> and S<sub>3</sub>).
- (b) One (1) flexographic printing press, identified as press No. 5, utilizing water-based inks, with a maximum line speed of five hundred (500) feet per minute and a maximum web width of forty-six (46) inches, constructed in 1991, and exhausting to one (1) stack (stacks S<sub>4</sub>).
- (c) One (1) flexographic printing press, identified as press No. 6, utilizing water-based inks, with a maximum line speed of one thousand (1000) feet per minute and a maximum web width of twenty (20) inches, constructed in 1999, and exhausting to one (1) stack (stacks S<sub>17</sub>).
- (d) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 48, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 2000, and exhausting into the plant atmosphere.
- (e) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 49, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 2001, and exhausting into the plant atmosphere.

- (f) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 50, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 1998, and exhausting into the plant atmosphere.
- (g) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 51, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 1997, and exhausting into the plant atmosphere.
- (h) Six (6) flexographic tail printers and associated tuber/bagger machine, identified as TP 52, 53, 55, 56, 57, and 58, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-eight (28) inches, constructed in 1994, and exhausting into the plant atmosphere.
- (i) One (1) flexographic tail printer and associated tuber/bagger machine, identified as TP 54, utilizing water-based inks, with a maximum continuous line speed of two hundred fifty (250) feet per minute and a maximum web width of twenty-four (24) inches, constructed in 1994, and exhausting into the plant atmosphere.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-2-4]:
  - (1) One (1) natural gas and fuel oil No. 2 fired boiler, constructed in 1980, identified as B1, with a maximum heat input capacity of 5.23 MMBtu per hour;
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2];
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4];
- (d) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; Vessels storing lubricating oils, hydraulic oils, and machining fluids;
- (e) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (f) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;



- (g) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower; and
- (h) Activities with emissions below insignificant thresholds: 5 tons per year PM or PM<sub>10</sub>, 10 tons per year SO<sub>2</sub>, NO<sub>x</sub>, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs;
  - (1) One (1) press dryer, identified as press No. 6 dryer, rated at 3.0 MMBtu/hr, exhausting to one (1) stack (S<sub>17</sub>);
  - (2) One (1) #3 Weber Bag Machine, exhausting to one (1) stack (S<sub>7</sub>);
  - (3) One (1) #5 Weber Bag Machine, exhausting to one (1) stack (S<sub>6</sub>); and
  - (4) One (1) microwave popcorn bag machine, exhausting to one (1) stack (S<sub>13</sub>).

### Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Title V Permit (T007-7645-00010), issued on March 30, 1998;
- (b) Construction Permit No.: CP007-10026-00010, issued December 3, 1998;
- (c) First Significant Permit Modification No.: 007-9795-00010, issued on June 2, 1999;
- (d) First Minor Permit Modification No.: 007-12289-00010, issued on August 21, 1999;
- (e) First Administrative Amendment No.: 007-11025-00010, issued on August 23, 1999;
- (f) Second Administrative Amendment No: 007-14433-00010, issued on July 17, 2001; and
- (g) Third Administrative Amendment No: 007-14563-00010, issued on August 14, 2001.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, they were not incorporated into this Part 70 permit:

- (a) Section D.1 of T007-7645-00010, issued March 30, 1998, and Section D.1 of SPM007-9795-00010. These sections pertained to rotogravure printing presses.

Reason Not Incorporated: The rotogravure printing presses are no longer operating at the source.

- (b) Conditions D.3.1, D.3.5, and D.3.8 of CP-007-10026-00010, issued December 3, 1998: VOC Limitation for PSD and Recordkeeping/Reporting; The input VOC usage for the flexographic printing press No. 6 shall be limited to 35.7 tpy per twelve month period. The permittee shall record each month and report each quarter the total amount of VOC delivered to the applicators of flexographic printing press No. 6.

Reason Not Incorporated: The source's potential to emit for VOC from the printing presses changed from greater than 250 tpy (original Part 70 permit T007-7645-00010, issued on March 30, 1998) to 118 tpy (this Part 70 renewal) because two printing presses (the rotogravure press and flexographic press No. 3) were permanently shut down. As a result, the source is no longer major for PSD and the 35.7 tpy VOC limit is not necessary to prevent a major modification to the source and avoid PSD. In addition, the 35.7 tpy emission estimate was based on the press having a maximum design speed of 1000 feet/min and a proposed maximum print width of 36 inches (CP 007-7038-00010 issued on June 24, 1997). The source installed a smaller printing press with the same design speed and a printing width of 20 inches instead of 36 inches. Based on a maximum design speed of 1000 feet per minute and a printing width of 20 inches, the potential to emit is 24.53 tons of VOC per year. Therefore, the 35.7 tpy VOC limit is irrelevant and incorrect for this source.

- (c) Conditions D.4.3, D.4.4, and D.4.5 of CP-007-10026-00010, issued December 3, 1998; The amount of solvent usage shall be limited to twelve (12) gallons per month. This limit is necessary in order to ensure that the VOC emission from the degreaser operations are limited to fifteen thousands (0.015) tons per month.

Reason Not Incorporated: This limit was incorporated into the original Part 70 permit to keep the net increase of VOC from exceeding 40 tpy. Because the source is no longer major for PSD, this condition is unnecessary and was not included in this Part 70 renewal. Conditions D.4.4 and D.4.5 are the recordkeeping and reporting requirements for Condition D.4.3. Since Condition D.4.3 was not incorporated, Conditions D.4.4 and D.4.5 are not included in this Part 70 permit renewal.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on June 27, 2002. Additional information was received on August 21, 2002.

There was no notice of completeness letter mailed to the source.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding emission limits that were contained in the previous Part 70 permit.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 25
VOC	greater than 100, less than 250
CO	less than 100

NO <sub>x</sub>	less than 100
-----------------	---------------

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Individual HAPs	less than 10
TOTAL	less than 25

- (a) The potential emissions of volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	0
SO <sub>2</sub>	0
VOC	14.63
CO	0
NO <sub>x</sub>	0

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Total HAPs
Printing Presses	--	--	--	118.3	--	--	Less than 25
Insignificant	0.2	0.2	--	0.1	--	--	--
Total Emissions	0.2	0.2	--	118.4	--	--	Less than 25

### County Attainment Status

The source is located in Benton County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Benton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Benton County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

#### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

#### Federal Rule Applicability

- (a) There are no New Source Performance Standards(NSPS) (326 IAC 12 and 40 CFR 60) applicable to this source.
  - (1) The flexographic printing presses (press No. 4, press No. 5, press No. 6, and TP-48 through TP-58) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.430, Subpart QQ because they are flexographic printers and not rotogravure printers.
  - (2) The 5.23 MMBtu/hr natural gas/distillate oil boiler is not subject to the New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because the boiler has a heat input less than 10 MMBtu per hour.
- (b) All the flexographic printing presses (press No. 4, press No. 5, press No. 6, and TP 48 through TP-58) are subject to the National Emission Standards for Hazardous Air

Pollutants (Printing and Publishing Industry), 326 IAC 20-18, (40 CFR 60.820, Subpart KK) because the source was a major source of HAPs when the rule was promulgated.

40 CFR Part 63, Subpart KK is applicable to each wide web flexographic printing press. Wide web flexographic printing presses are capable of printing greater than 18 inches in width. All the flexographic presses (press No. 4, press No. 5, press No. 6, and TP 48 through TP-58) are capable of printing 20 inches or more in width.

Under 40 CFR 63.829(d), the owner or operator of each facility shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

Under 40 CFR 63.830(b)(1), each owner or operator of an affected source subject to this subpart shall submit the reports specified in paragraph (b)(1) to the Administrator:

An initial notification required in Section 63.9(b).

- (1) Initial notification for existing sources shall be submitted no later than one year before the compliance date specified in Section 63.9(b).
- (2) Initial notification for new and reconstructed sources shall be submitted as required by 63.9(b).
- (3) For the purposes of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under 63.9(b) provided the same information is contained in the permit application as required by 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.
- (4) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart KK.

The source is no longer a major source of HAPs since the rotogravure press has been removed. During this renewal process, the source specifically requested that the permit contain language stated that the source is a minor source of HAPs. This language has been incorporated into the permit. Based on 63.820(c)(3) of Subpart KK, each source that commits to and meets the minor source HAP levels shall be considered an area source and subject only to 63.829(d) and 63.830(b)(1).

- (c) The degreasing operations are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning (326 IAC 20-18), because only non-halogenated solvents are used at this source.
- (d) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring (CAM). In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve

compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classified as a major source. Additionally, the source must receive a Part 70 permit. No unit at the source has the potential to emit greater than one hundred percent (100%) of the amount required for a source to be classified as a major source. Therefore, this source is not subject to CAM.

- (e) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source has the potential to emit less than ten (10) tons per year of a single HAP and the potential to emit less than twenty-five (25) tons per year of any combination of HAPs and the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

The source is not 1 of the 28 listed source categories and it was constructed in 1952 prior to promulgation of PSD regulations. The potential VOC emissions from the rotogravure press installed in 1952 were greater than 250 tons per year. Because the source was constructed prior to the applicability of PSD regulations, the source did not require a PSD permit and was classified an existing major source.

In 1959, the source installed a flexographic printing press (press #3). The potential emissions from this installation were greater than 100 but less than 250 tons per year of VOC. Although the source was major for VOC prior to the installation of press #3, PSD was not applicable because the installation was still prior to the applicability of any PSD regulations.

There were no modifications to the rotogravure press and flexographic printing press (press#3) since their original construction dates. Both of these units were shut down in 2002 and no longer operate at the source.

The source was major for PSD after the regulations went into effect. Since the PSD regulations went into effect, several modifications have been made at the source but none triggered PSD because the net increase in emissions from each modification was less than 40 tons of VOC per year.

At the time of construction for flexographic printing press No. 6, the source was still a PSD major source as source-wide VOC emissions were greater than 250 tons per year. The source received a construction permit, CP007-10026-00010, issued December 3, 1998, for press No. 6 to have a maximum design speed of 1000 feet/min and a maximum print width of 36 inches. At these specifications, press No. 6 had the potential to emit greater than 40 tons of VOC per year and therefore, CP007-10026-00010, issued December 3, 1998 contained a PSD limit for the press of less than or equal to 35.7 tons of VOC per year to ensure the modification was a minor modification. Since the construction of press No. 6, two presses were shut down and the potential to emit from the source was reduced to 118 tons per year. Thus, the source became a minor PSD source. For this reason, the PSD minor modification limit for press No. 6 was not included in this permit. Additionally, press No. 6 was not constructed to have a maximum design speed of 1000 feet/min or a maximum print width of 36 inches. Instead, a smaller press was installed with the same design speed, but with a print width of 20 inches. Based on these specifications, the press has the potential to emit 24.53 tons of VOC per year. This also makes the PSD minor modification limit of 35.7 tons of VOC per year unnecessary.

CP007-10026-00010, issued December 3, 1998, also contained a solvent usage limit for the degreaser to ensure that degreaser VOC emissions were less than 40 tons per year. This would ensure that the construction of the degreaser was a PSD minor modification. This limit was not included in this permit because the source is no longer a PSD major source and therefore the limit is unnecessary.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

- (a) Flexographic printing presses No. 4 and No. 5 and flexographic tail printers TP 52, 53, 55, 56, 57, 58, and 54 are not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) because they do not individually have the potential to emit ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs and they were constructed prior to July 27, 1997, the applicability date of this rule.
- (b) Flexographic printing press No. 6 and flexographic tail printers TP 48, 49, 50, and 51 are not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) even though they were constructed after July 27, 1997, the applicability date of this rule, because they do not individually have the potential to emit ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

326 IAC 6-4 applies to all sources that generate fugitive dust. The source has paved roads which generate fugitive dust and as a result are subject to 326 IAC 6-4.

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to 326 IAC 6-5 because the fugitive particulate matter potential to emit is less than twenty-five (25) tons per year.

**State Rule Applicability - Individual Facilities**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Flexographic printing presses No. 4, No. 5, and No. 6 and flexographic tail printers TP 49 through TP 58 are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because they do not have the potential to emit particulate.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

- (a) Flexographic printing press No. 5 is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) even though it was constructed after the applicability date of January 1, 1980 because printing press No. 5 is subject to the requirements of 326 IAC 8-5-5(c)(1) (Graphic Arts Operations). Additionally, the source has agreed to limit the potential to emit of the press to less than twenty-five (25) tons of VOC per year to render the requirements of 326 IAC 8-5-5(e) not applicable.
- (b) Flexographic printing presses No. 4 and No. 6 and flexographic tail printers TP 48 through TP-58 are not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) even though they were constructed after the applicability date of January 1, 1980 because these facilities are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations). Additionally, they do not individually have the potential to emit twenty-five (25) tons per year of VOC.

326 IAC 8-2-5 (Paper Coating Operations)

- (a) Flexographic printing press No. 5 is not subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) even though it was constructed after the applicability date of January 1, 1980 because the press is subject to the requirements of 326 IAC 8-5-5(c)(1) (Graphic Arts Operations).
- (b) Flexographic printing presses No. 4 and No. 6 and flexographic tail printers TP 48 through TP-58 are not subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) even though they were constructed after the applicability date of January 1, 1980 because they do not individually have the potential to emit twenty-five (25) tons per year of VOC and these facilities are subject to the requirements of 326 IAC 8-5-5(c)(1) (Graphic Arts Operations).

326 IAC 8-5-5 (Graphic Arts Operations)

Flexographic printing presses No. 4, No. 5, and No. 6, and flexographic tail printers TP48 through TP58 are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because these facilities were constructed after the applicability date of January 1, 1980 in 326 IAC 8-5-1(2), the source was constructed prior to November 1, 1980 as listed in 326 IAC 8-5-5(a)(1), and the source has the potential to emit greater than one hundred (100) tons per year of VOC. Pursuant to 326 IAC 8-5-5(c)(1), the volatile fraction of the ink, as it is applied to the substrate, shall contain twenty-five percent (25%) by volume or less of organic solvent and seventy-five percent (75%) by volume or more of water.

Flexographic printing press No. 5 is not subject to the requirements of 326 IAC 8-5-5(e) because the source has agreed to limit the VOC potential to emit from this facility to less than twenty-five (25) tons per year. Therefore, the source shall comply with the following requirements:

The VOC input to flexographic printing press No.5 shall not exceed twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limitation is equivalent to VOC emissions of less than twenty-five (25) tons per year. Compliance with this limit will render the requirements of 326 IAC 8-5-5(e) not applicable.

Presses No. 4 and No. 6 have potential VOC emissions less than 25 tons per year, therefore they are not subject to the requirements of 326 IAC 8-5-5(e).



**326 IAC 8-6-1 (Organic Solvent Emission Limitations)**

The source commenced operation in 1952 with potential emissions greater than 100 tons per year. Because the source is not located in Lake or Marion County and commenced operation prior to October 7, 1974, 326 IAC 8-6-1 is not applicable.

**326 IAC 8-3-2 (Cold Cleaner Operation)**

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaners constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)**

The insignificant degreaser is not subject to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) even though it is a cold cleaner and it was constructed after July 1, 1990 because the degreaser has a remote solvent reservoir.

**326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)**

The 5.23 MMBtu/hr natural gas fuel combustion unit (B1) is subject to 326 IAC 6-2-4 because it is a boiler. Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from B1 constructed after September 1, 1983, shall be limited to 0.6 pounds per MMBtu heat input.

This limitation was calculated using the following equation:

$$P_t = \frac{1.09}{Q^{0.26}} = \frac{1.09}{(5.23)^{0.26}} = 0.7 \text{ lb/MMBtu}$$

Where:

- Pt = Pounds of particulate matter emitted per million Btu heat input; and
- Q = Total source maximum operating capacity in MMBtu per hour (Q = 5.23 MMBtu/hr)

Since the limit calculated using the formula in 326 IAC 6-2-4(a) is greater than the allowed limit of 0.6 lb/MMBtu for boilers with capacities less than 10 MMBtu/hr, the boiler shall comply with a particulate limit of 0.6 lb per MMBtu heat input.

**Testing Requirements**

No testing requirements were included in the previous TV permit or in this TV because the compliance methods are based on mass balance and recordkeeping.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this source because there are no control devices and actual VOC emissions are less than 25 tons per year for each unit at this source.

## **Conclusion**

The operation of this coated paper bag manufacturing operation shall be subject to the conditions of the attached Part 70 Permit No. T007-15808-00010.

**Printing Operations  
VOC Emissions - Potential to Emit**

Page 1 of 9 TSD App A

Company Name: Fowler Specialty Packaging  
Address City IN Zip: 407 South Adeway Road, Fowler, Indiana 47944  
Permit Number: T007-15808-00010  
Reviewer: ERG/EH  
Date: 8/12/02

**Flexo #4**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
Flexo #4	500	3154	31	97762

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	97762	9.50
Coat/Varnish	2.78	7%	100%	97762	9.50

**Total 19.01**

**Flexo #5**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
Flexo #5	500	3154	46	145066

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	145066	14.10
Coat/Varnish	2.78	7%	100%	145066	14.10

**Total 28.21**

**Flexo #6**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
Flexo #6	1000	6307	20	126144

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	126144	12.26
Coat/Varnish	2.78	7%	100%	126144	12.26

**Total 24.53**

**TP#52**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#52	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**TP#53**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#53	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**TP#54**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#54	250	1577	24	37843

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	37843	3.68
<b>Total</b>					<b>3.68</b>

**TP#55**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#55	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**TP#56**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#56	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**TP#57**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#57	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**TP#58**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#58	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**TP#51**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#51	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**TP#50**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#50	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**TP#49**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#49	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**TP#48**

Press ID	Maximum Line Speed (ft/min)	Maximum Line Speed (MMin/yr)	Maximum Print Width (in)	Throughput (MMin^2/yr)
TP#48	250	1577	28	44150

Ink Name	Maximum Coverage (lb/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/yr)	VOC Emissions (ton/yr)
Ink	2.78	7%	100%	44150	4.29
<b>Total</b>					<b>4.29</b>

**Facility-wide Total:** 118.3**Methodology**

Throughput = Maximum line speed (ft/min) \* 12 (in/ft) \* 60 (min/hr) \* 8760 (hr/yr) \* Maximum print width (in) \* 1/1000000

VOC = Maximum coverage (lb/MMin^2) \* Weight % Volatiles \* Flash Off % \* Throughput \* 1/2000 (ton/lb)

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MMBTU/HR<100  
Small Industrial Boiler**

**Company Name:** Fowler Specialty Packaging  
**Address City IN Zip:** 407 South Adeway Road, Fowler, Indiana 47944  
**Permit Number:** T007-15808-00010  
**Reviewer:** ERG/EH  
**Date:** 8/12/02

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

5.2

45.8

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.2	0.2	0.0	2.3	0.1	1.9

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

### Methodology

Note: Maximum heat input equals 36.6 MMBtu/hr because the hospitals are legally limited by law to have 100% full backup power at any time.

This legal requirement limits the maximum design to 36.6 MMBtu/hr for this new boiler house.

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**MMBTU/HR<100**  
**Small Industrial Boiler**

**Company Name:** Fowler Specialty Packaging  
**Address City IN Zip:** 407 South Adeway Road, Fowler, Indiana 47944  
**Permit Number:** T007-15808-00010  
**Reviewer:** ERG/EH  
**Date:** 8/12/02

HAPs - Organics

Emission Factor in lb/MMCF	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.811E-05	2.749E-05	1.718E-03	4.123E-02	7.789E-05

HAPs - Metals

Emission Factor in lb/MMCF	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.145E-05	2.520E-05	3.207E-05	8.705E-06	4.811E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.



**Particulate Matter from Roadways and Parking**

**Company Name:** Fowler Specialty Packaging  
**Address City IN Zip:** 407 South Adeway Road, Fowler, Indiana 47944  
**Permit #:** T007-15808-00010  
**Reviewer:** ERG/EH  
**Date:** 8/21/02

**Paved Roads**

There are two segments of paved roads that are used in these calculations.

One is at the west side of the Shipping and Receiving area. This is where semi's deliver and pick up goods at a rate of 20 to 25 semi's per week. The semi's travel 159 feet per trip for a rate of 0.0301 miles per trip (one-way). There are two one-way trips per semi, for an estimate of 50 trips per week (or 25 round trips), or 0.298 trips per hour (average).

The other paved road segment is at the east end of the building. This is where adhesive and pallet deliveries occur at a rate of approximately 4 semi's per month. The semi's travel 75 feet per trip for a rate of 0.0142 miles per trip (one-way). There are two one-way trips per semi, for an estimate of 8 trips per month (or 4 round trips), or 0.011 trips per hour (average).

The vehicle miles traveled (VMT) and trip distances are average numbers based on ongoing operations. To estimate the potential to emit (PTE), assumed a factor of 10 for VMT.

The following calculations determine the amount of emissions created by paved roads, based on 8760 hours of use and AP-42, Ch. 13.2.1 (10/97)

Maximum Vehicular Speed: 5 mph  
Average Distance of Haul: 0.0295 miles

Vehicle Type	No. of One Way Trips per Hour	Weight (tons)
Semi	2.98	25
Semi	0.11	25
total	3.09	

Calculations:

$$E = k(sL/2)^{0.65} * (W/3)^{1.5}$$

E = Emission factor (lbs/vehicle miles traveled(VMT))  
k = 0.016 particle size multiplier for PM-10  
0.082 particle size multiplier for PM  
sL = 0.015 road surface silt content (g/m<sup>2</sup>) (for limited access roads)  
W = 25 weighted average vehicle weight (tons) (**calculate from table above**)

source: AP-42, chapter 13.2.1, p. 13.2.1-6.

$$VMT = 796.2 \text{ (miles/yr)}$$

$$E = \frac{PM}{0.08200339 \text{ lbs/VMT}}$$

Potential PM Emissions (ton/yr) = Emission factor (lbs/VMT) \* VMT / 2000 (lbs/ton)  
Potential PM Emissions (ton/yr) = **0.03 tpy**

$$E = \frac{PM-10}{0.01600066 \text{ lbs/VMT}}$$

Potential PM-10 Emissions (ton/yr) = Emission factor (lbs/VMT) \* VMT / 2000 (lbs/ton)  
Potential PM-10 Emissions (ton/yr) = **0.01 tpy**

**Company Name:** Fowler Specialty Packaging  
**Address City IN Zip:** 407 South Adeway Road, Fowler, Indiana 47944  
**Permit #:** T007-15808-00010  
**Reviewer:** ERG/EH  
**Date:** 8/21/02

### Unpaved Roads

There is one segment of unpaved roadway that is used in these calculations. It is on the south side of the Shipping and Receiving building. This access road is used by company vans approximately 4 times per month. The vans travel 431 feet per trip for a rate of 0.0816 miles per trip (one-way). There are two one-way trips per van, for an estimate of 8 trips per month (or 4 round trips), or 0.011 trips per hour.

The vehicle miles traveled (VMT) and trip distances are average numbers based on ongoing operations. To estimate the potential to emit (PTE), assumed a factor of 10 for VMT.

The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP-42, Ch. 13.2.2 (Supplement E, 9/98)

$$\begin{aligned}
 &0.110 \text{ trip/hr} \times \\
 &0.0816 \text{ mile/trip} \times \\
 &1 \text{ (round trip)} \times \\
 &8760 \text{ hr/yr} = 78.36 \text{ miles per year}
 \end{aligned}$$

### PM

Method:  $E_f = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] * [(365-p) / 365]$

= 4.06

where:

k = 10 (particle size multiplier for PM-10) (k = 10 for PM-30 or TSP)

s = 6.4 mean % silt content of unpaved gravel roads (see Table 13.2.2-1)

b = 0.5 Constant for PM-10 (b = 0.5 for PM-30 or TSP)

c = 0.4 Constant for PM-10 (c = 0.4 for PM-30 or TSP)

W = 3 tons average vehicle weight

Mdry = 0.2 surface material moisture content, %

p = 120 no. of days with at least 0.254 mm of precipitation (see Fig/ 13.2.2-1)

4.06 lb/mi \* 78.36 mi/yr = **0.16 ton/yr**

### PM10

Method:  $E_f = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] * [(365-p) / 365]$

= 1.06

where:

k = 2.6 (particle size multiplier for PM-10) (k = 10 for PM-30 or TSP)

s = 6.4 mean % silt content of unpaved gravel roads (see Table 13.2.2-1)

b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)

c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)

W = 3 tons average vehicle weight

Mdry = 0.2 surface material moisture content, %

p = 120 no. of days with at least 0.254 mm of precipitation (see Fig/ 13.2.2-1)

1.06 lb/mi \* 78.36 mi/yr = **0.04 ton/yr**

**Company Name:** Fowler Specialty Packaging  
**Address City IN Zip:** 407 South Adeway Road, Fowler, Indiana 47944  
**Permit Number:** T007-15808-00010  
**Reviewer:** ERG/EH  
**Date:** 8/12/02

Page 9 of 9 TSD App A

**TOTAL POTENTIAL TO EMIT - SOURCE**

	<b>PM</b>	<b>PM-10</b>	<b>SO2</b>	<b>NOx</b>	<b>CO</b>	<b>VOC</b>	<b>HAP - individual</b>	<b>HAP - combination</b>
<b>Boiler</b>	0.2	0.2	-	2.3	1.9	0.1	-	-
<b>Printing</b>	-	-	-	-	-	118.3	10	25
<b>Degreasing</b>	-	-	-	-	-	-	-	-
<b>Paved/Unpaved Roads</b>	0.2	0.1	-	-	-	-	-	-
<b>Total</b>	<b>0.4</b>	<b>0.3</b>	<b>-</b>	<b>2.3</b>	<b>1.9</b>	<b>118.4</b>	<b>10</b>	<b>25</b>